

Appl. No. 09/828,927
Amendment

AMENDMENTS TO THE DRAWINGS

Submitted herewith is an amended Fig. 1 as requested by the examiner.

REMARKS

Claims 1, 2 and 4-12 are all the claims pending in the application. Reconsideration of the application and allowance of all claims are respectfully requested.

All claims stand rejected as unpatentable over Hino (USP 6,172,976) in view of Svennevik et al (USP 6,108,705). This rejection is respectfully traversed.

As explained in the amendment filed August 28, 2006, the present invention is directed to an arrangement wherein two connection control modules which are part of the same switching node can each handle a half call and then can communicate with one another to connected their respective half calls. The claims were amended to emphasize this aspect of the invention. Hino was distinguished on the basis that it does not teach the arrangement of elements, including the communication channel between two connection control modules as recited in claim 1.

In the present rejection, the examiner acknowledges that Hino does not teach the communication channel described in the last paragraph of claim 1, but relies on Svennevik et al to teach this. But it is submitted that the combination of features proposed by the examiner would not have been obvious to one of ordinary skill in the art absent the teaching of the present application.

Accepting the examiner's reading of the claim language on Hino, the claimed first service control module corresponds to the service implementation device 252, the claimed second service control module corresponds to the service implementation device 253, the claimed first connection control module corresponds to the elements 711, 731, 721, 262 and 222, and the claimed second connection control module corresponds to the elements 712, 732, 722, 263 and

223. Claim 1 describes the first and second connection control modules as establishing connections to first and second physical devices, and then the last paragraph of the claim requires a communication channel between the first and second connection control modules by which one of the first and second connection control modules can send to the other of the connection control modules a link request message indicating that a connection is to be made between the first and second physical devices. Svennevik et al does generally relate to call setup, but does not include anything which would have led the ordinarily skilled artisan to provide the claimed channel between the first and second connection control modules. The examiner refers to the discussion at lines 35-55 of column 9 of Svennevik et al as allegedly teaching claimed communication channel, but (1) the examiner has not identified anything in Svennevik et al which corresponds to the claimed first and second connection control modules, so it cannot be said that Svennevik et al teaches a communication channel between connection control modules, and (2) the examiner has not identified any communication channel in Svennevik et al which serves some function which would be useful in Hino and therefore would have been obvious to incorporate into the Hino system.

The language of claim 1 requires a first connection control module which responds to a first service request message to establish a connection to a first physical device. The claim requires that a communication channel exist between first and second connection control modules by which one can send to the other a link request indicating that a connection should be established between the first and second physical devices. Svennevik et al discloses a connection handling portion 320 which controls the setup of connections for a call, but there are no disclosed connection control modules nor a communication channel between them. Further,

Svennevik et al is a completely different type of call handling system from Hino, and to take the concept of the connection handling portion 320 and apply it to Hino (1) would not have been obvious without some direction which the examiner has not identified and (2) would not in any event have resulted in the claimed invention unless the artisan were using the present claims as a road map for the combination.

Hino provides a single service controller 741 for the three service control units 701, 702 and 703 in Fig. 8. To the extent there is some central function that needs to be performed, it would be done or at least coordinated through the service controller 741. Thus, Hino and Svennevik et al are similar in that in each case there is a single controller or function (741 or 320) which is responsible for setting up all calls regardless of which service control unit/module they originate from. Because there is a single unit in common for this purpose, there is no need for a communication channel between separate connection control modules as is recited in the present claims. Why provide a communication channel between the elements the examiner has identified as corresponding to the connection control modules if they are all controlled from a common source 741 which can already do whatever is needed to instruct one to implement a connection to the other? Certainly not from some teaching of a common controller which is a concept already present in the existing Hino system.

Without some specific direction from the prior art, or a clear motivation that would exist, the proposed modification of Hino would not have been obvious from the teachings of Svennevik et al, and it is submitted that the obviousness only appears through hindsight after reviewing the present application. Accordingly, it is submitted that the claimed invention would

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not have been obvious from the teachings of the prior art, and allowance of all claims is respectfully requested.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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CUSTOMER NUMBER

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